

DVORAK & ASSOCIATES, LLC
390 George Street, 8th Floor
New Brunswick NJ 08901
(732) 317-0130 FAX (732) 317-0140
Attorney for Defendant Joseph Graffagnino

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
TRENTON, NEW JERSEY

HASSAN CHERRY

Plaintiff

vs.

**COUNTY OF MIDDLESEX NEW
JERSEY, COUNTY OF MIDDLESEX
BOARD OF FREEHOLDERS,
MIDDLESEX COUNTY ADULT
CORRECTION CENTER, EDWARD
CHICCHI, FREEHOLDER(S)
ASSIGNED TO AND/OR IN
CHARGE OF THE MIDDLESEX
COUNTY ADULT CORRECTION
CENTER, JOSEPH GRAFFAGNINO,
JAMES SHAPIRO, MICHAEL
DELANOY, R. CHRISTIANSEN,
ARTHUR BROWN, C. BARTH, B.
BAVOSA, SCOTT NAPRAVNIK, C.
BARTH, M. RODZIEWICZ, PAUL
M. DEAMICIS, DEPUTY COURT
ADMINISTRATOR OF THE NORTH
BRUNSWICK MUNICIPAL COURT,
SHERAL ROSSMANN,
ADMINISTRATOR OF THE NORTH
BRUNSWICK MUNICIPAL COURT,
NORTH BRUNSWICK MUNICIPAL
COURT, NORTH BRUNSWICK
TOWNSHIP, MARY DOES 1-30,
JOHN SMITHS 1-30 AND MARY
SMITHS 1-30**

Defendants.

**Civil Action No. 3:09-cv-01499
(MLC-LHG)**

**NOTICE OF CROSS MOTION FOR MORE
DEFINITE STATEMENT**

SIRS:

PLEASE TAKE NOTICE that the undersigned attorneys for Defendant Joseph Graffagnino, will apply to the above-named Court at the United States District Court, Trenton, New Jersey for an Order granting Defendant's Cross Motion for a more definite statement.

PLEASE TAKE FURTHER NOTICE that in support of said motion, plaintiffs shall rely upon the Brief and Certification submitted by John F. Gillick, Esq. on behalf of Defendant, Michael Delanoy, and the attached Certification of Francis D. Engracia, Esq.

PLEASE TAKE FURTHER NOTICE that in accordance with Rule 6(d) of the General Rules of this Court, a proposed Order is annexed hereto.

DVORAK & ASSOCIATES, LLC
Attorneys for Defendant, Joseph Graffagnino

Dated: December 8, 2009

By: /s/ Francis D. Engracia
FRANCIS D. ENGRACIA, ESQ.